

# **Exhibit A**

**Bell, Robert**

---

**From:** Bell, Robert  
**Sent:** Tuesday, October 19, 2021 9:46 PM  
**To:** sami.sultan@triplearrow.com  
**Cc:** Curran, Thomas J.; Short, Doris D.; Bell, Robert  
**Subject:** DGCI Corporation v. Triple Arrow Company, Case No. 21-CV-01174, U.S. District Court for the Eastern District of Virginia  
**Attachments:** 1 - Complaint.pdf; 6 - Proposed Summons.pdf; Injunction Motion and Brief.pdf; 5 - Motion, Memo, and Supporting Docs.zip

Dear Mr. Sultan,

As you know, we represent DGCI Corporation ("DGCI").

Attached please find a courtesy copy of the Complaint and [proposed] Summons filed by DGCI today in the U.S. District Court for the Eastern District of Virginia, captioned *DGCI Corporation v. Triple Arrow Company for General Trading Co. Ltd.*, No 21-CV-01174. Despite DGCI's good faith efforts to try to resolve the ongoing dispute with Triple Arrow, DGCI is obliged to file this litigation due to Triple Arrow's improper actions against DGCI personnel and property in Iraq, including through filing suit against DGCI in Iraq. In addition, attached please find a courtesy copy of DGCI's Motion for an Anti-Suit Injunction which seeks an injunction prohibiting Triple Arrow from proceeding with its lawsuit against DGCI in Iraq. The mandatory forum selection clause in the parties' MSA requires any disputes to be litigated in the U.S. District Court for the Eastern District of Virginia, not in Iraq.

Please advise as soon as possible, but no later than October 21, 2021, whether your client consents to accept service of the Summons and Complaint and the Motion for an Anti-Suit Injunction by email.

Regards,

Robert H. Bell  
Peckar & Abramson, P.C.  
1325 Avenue of the Americas | 10<sup>th</sup> Floor | New York, NY 10019  
office 212.382.0909  
[rbell@pecklaw.com](mailto:rbell@pecklaw.com) | [www.pecklaw.com](http://www.pecklaw.com)

# **Exhibit B**

**Bell, Robert**

---

**From:** Bell, Robert  
**Sent:** Wednesday, October 20, 2021 9:08 PM  
**To:** sami.sultan@triplearrow.com  
**Cc:** Curran, Thomas J.; Short, Doris D.; Bell, Robert  
**Subject:** FW: DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia -- PART ONE  
**Attachments:** 1 - Complaint.pdf; 7 - Summons Issued.pdf; 11 - Motion for TRO and Proposed Order.pdf; 12 - Rule 65 Cert.pdf; 13 - Motion for PI and Proposed Order.pdf; 14 - Memo ISO TRO and PI.pdf; Segment 001 of 15 - Decl ISO TRO and PI.pdf; Segment 002 of 15 - Decl ISO TRO and PI.pdf; Segment 003 of 15 - Decl ISO TRO and PI.pdf

Dear Mr. Sultan,

As you know, we represent DGCI Corporation ("DGCI").

Further to my email of October 19, 2021, attached please find a courtesy copy of the following documents that have been filed in the action DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia. This email is part one of two:

- Complaint against Triple Arrow and Summons;
- Motion for Temporary Restraining Order against Triple Arrow with supporting certification;
- Motion for Preliminary Injunction against Triple Arrow
- Memorandum of Law in Support of Motions for TRO and Preliminary Injunction;
- Declaration and Exhibits in Support of Motions for TRO and Preliminary Injunction (parts 1-3 of 5)

Please advise as soon as possible whether your client consents to accept service of the Summons and Complaint and the Motion for a Temporary Restraining Order and Motion for Preliminary Injunction by email.

Regards,

Robert H. Bell  
Peckar & Abramson, P.C.  
1325 Avenue of the Americas | 10<sup>th</sup> Floor | New York, NY 10019  
office 212.382.0909  
[rbell@pecklaw.com](mailto:rbell@pecklaw.com) | [www.pecklaw.com](http://www.pecklaw.com)

# **Exhibit C**

**Bell, Robert**

---

**From:** Bell, Robert  
**Sent:** Wednesday, October 20, 2021 9:09 PM  
**To:** sami.sultan@triplearrow.com  
**Cc:** Curran, Thomas J.; Short, Doris D.; Bell, Robert  
**Subject:** FW: DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia -- PART TWO  
**Attachments:** Segment 004 of 15 - Decl ISO TRO and Pl.pdf; Segment 005 of 15 - Decl ISO TRO and Pl.pdf

Dear Mr. Sultan,

As you know, we represent DGCI Corporation ("DGCI").

Further to my email of October 19, 2021, attached please find a courtesy copy of the following documents that have been filed in the action DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia. This email is part two of two:

- Continued Exhibits in Support of Motions for TRO and Preliminary Injunction (parts 4-5 of 5)

Please advise as soon as possible whether your client consents to accept service of the Summons and Complaint and the Motion for a Temporary Restraining Order and Motion for Preliminary Injunction by email.

Regards,

Robert H. Bell  
Peckar & Abramson, P.C.  
1325 Avenue of the Americas | 10<sup>th</sup> Floor | New York, NY 10019  
office 212.382.0909  
[rbell@pecklaw.com](mailto:rbell@pecklaw.com) | [www.pecklaw.com](http://www.pecklaw.com)

# **Exhibit D**

**Bell, Robert**

---

**From:** Bell, Robert  
**Sent:** Saturday, October 23, 2021 2:59 AM  
**To:** sami.sultan@triplearrow.com  
**Cc:** Curran, Thomas J.; Short, Doris D.; Bell, Robert  
**Subject:** RE: DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia  
**Attachments:** 20 - Notice of Hearing (TRO).pdf; 19 - Notice of Hearing (PI).pdf

Dear Mr. Sultan,

As you know, we represent DGCI Corporation ("DGCI").

Further to my emails from earlier this week, attached please find the hearing notice for October 27, 2021 at 2:00 p.m. at the U.S. District Court for the Eastern District of Virginia regarding DGCI's request for a temporary restraining order in this matter. Also attached is the hearing notice for November 17, 2021 at 10:00 a.m. regarding DGCI's request for a preliminary anti-suit injunction against Triple Arrow.

Regards,

Robert H. Bell  
Peckar & Abramson, P.C.  
1325 Avenue of the Americas | 10<sup>th</sup> Floor | New York, NY 10019  
office 212.382.0909  
[rbell@pecklaw.com](mailto:rbell@pecklaw.com) | [www.pecklaw.com](http://www.pecklaw.com)

**From:** Bell, Robert [RBell@pecklaw.com](mailto:RBell@pecklaw.com)  
**Sent:** Wednesday, October 20, 2021 9:08 PM  
**To:** sami.sultan@triplearrow.com  
**Cc:** Curran, Thomas J. <TCurran@pecklaw.com>; Short, Doris D. <DShort@pecklaw.com>; Bell, Robert <RBell@pecklaw.com>  
**Subject:** FW: DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia -- PART ONE

Dear Mr. Sultan,

As you know, we represent DGCI Corporation ("DGCI").

Further to my email of October 19, 2021, attached please find a courtesy copy of the following documents that have been filed in the action DGCI Corporation v. Triple Arrow, No. 21-CV-1174, U.S. District Court for the Eastern District of Virginia. This email is part one of two:

- Complaint against Triple Arrow and Summons;
- Motion for Temporary Restraining Order against Triple Arrow with supporting certification;
- Motion for Preliminary Injunction against Triple Arrow
- Memorandum of Law in Support of Motions for TRO and Preliminary Injunction;
- Declaration and Exhibits in Support of Motions for TRO and Preliminary Injunction (parts 1-3 of 5)



Please advise as soon as possible whether your client consents to accept service of the Summons and Complaint and the Motion for a Temporary Restraining Order and Motion for Preliminary Injunction by email.

Regards,

Robert H. Bell  
Peckar & Abramson, P.C.  
1325 Avenue of the Americas | 10<sup>th</sup> Floor | New York, NY 10019  
office 212.382.0909  
[rbell@pecklaw.com](mailto:rbell@pecklaw.com) | [www.pecklaw.com](http://www.pecklaw.com)